



January 27, 2015

FedEx: 7725 6903 8053

Mr. James Rebarchak
Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Re: **Monroe Energy, LLC – Trainer Refinery**
40 CFR 63, Subpart UUU: Semi-Annual Periodic Report
40 CFR 60, NSPS J: Semi-Annual Report
Reporting Period: July 1, 2014 – December 31, 2014

Dear Mr. Rebarchak:

In accordance with 40 CFR 63 Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units and Sulfur Recovery Plants, Monroe Energy, LLC's Trainer Refinery hereby submits this semi-annual compliance report (per §63.1575(b)(2)) for the period beginning July 1, 2014 and ending December 31, 2014. This report is also being submitted in compliance with 40 CFR 60.107(d), (e) and (f) and 40 CFR 60.7 (c) for the continuous monitoring systems required by the New Source Performance Standards (NSPS) for the North Side and South Side refinery fuel gas systems that are continuously monitored for H₂S, Sulfur Recovery Unit (SRU) for SO₂, and the Fluid Catalytic Cracking Unit (FCCU) for PM, CO, and SO₂.

Please note that the Refinery's Main Flare and Sour Gas Flare accepted NSPS J applicability on July 1, 2013, pursuant to the Refinery's Consent Decree (Civil Action H-05-0258). On October 1, 2013, the Refinery submitted data to the Pennsylvania Department of Environmental Protection (PADEP) certifying the performance of the H₂S CEMS associated with these flares.

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

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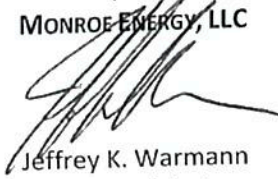
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Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
(610) 364-8000

Should you have any questions or comments regarding this report, please contact Mr. Matt Torell, Environmental Leader, at (610) 364-8399.

Sincerely,

MONROE ENERGY, LLC



Jeffrey K. Warmann
CEO & President

Enclosure

cc: Matt Torell (Monroe)

FedEx: 7725 6919 9242

U.S. EPA, Region III

Director, Air Protection Division

Mail Code 3AP20

1650 Arch Street

Philadelphia, Pa 19103-2029

**MONROE ENERGY, LLC
TRAINER REFINERY**

SEMIANNUAL PERIODIC REPORT

Reporting Period: July 1, 2014 – December 31, 2014

The Refinery MACT 2 emission standards (40 CFR 63 Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units and Sulfur Recovery Plants) regulate the following refinery affected sources:

1. Fluidized Catalytic Cracking Unit (FCCU – Source ID 101)
2. Catalytic Reforming Unit (Platformer Unit – Source ID 119)
3. Sulfur Recovery Unit (SRU – Source ID 102)
4. Each Bypass line serving the above units that could divert an affected vent stream away from a control device used to comply with the requirements of this subpart.

This semi-annual report for the period beginning July 1, 2014 and ending December 31, 2014 addresses the status of facility compliance with Subpart UUU.

COMPLIANCE STATUS: 40 CFR 63 SUBPART UUU

1. FCCU:

[\$63. 1564-1565]

The refinery operates one FCCU. On November 22, 2005 the facility received approval from U.S. EPA for an Alternative Monitoring Plan (AMP) in lieu of the requirement to install and operate a Continuous Opacity Monitoring (COM) System on the FCCU wet gas scrubber (WGS) stack. The AMP requires the refinery to monitor WGS liquid-to-gas ratio to continuously demonstrate compliance with the limits established during performance testing conducted in 2006 and 2007.

The average liquid-to-gas ratio was calculated for each operating hour during the period from July 1 to December 31, 2014. The L-to-G ratio was above the minimum ratio of 0.08 gal/scf established during the 2007 performance test (i.e., there were no deviations during the reporting period).

For the reporting period (July 1 to December 31, 2014), the FCCU was in compliance with the Refinery MACT 2.

As required under §63.1575(d) and (e), the following information is provided for the FCCU for the period July 1, 2014 to December 31, 2014:

(d)(1) The total operating time of each affected source during the reporting period: The FCCU operated 4,296 hours out of the possible 4,416 hours for the period.

(d)(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken: There were no reportable events that occurred during the reporting period.

(d)(3) Information on the number, duration, and cause for monitor downtime incidents (including unknown cause, if applicable, other than downtime associated with zero and span and other daily calibration checks): See attached Table 1.

(e)(1) The date and time that each malfunction started and stopped: There were no reportable events that occurred during this reporting period.

(e)(2) The date and time that each continuous opacity monitoring system or continuous emission monitoring system was inoperative, except for zero (low-level) and high-level checks: See attached Table 1.

(e)(3) The date and time that each continuous opacity monitoring system or continuous emission monitoring system was out-of-control, including the information in §63.8(c)(8): See attached Table 1 and Attachment A.

(e)(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period: There were no reportable events that occurred during this reporting period.

(e)(5) A summary of the total duration of the deviation during the reporting period (recorded in minutes for opacity and hours for gases and in the averaging period specified in the regulation for other types of emission limitations), and the total duration as a percent of the total source operating time during that reporting period: There were no reportable events during this reporting period.

(e)(6) A breakdown of the total duration of the deviations during the reporting period and into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes:

- Startup, shutdown: 0 hours
- Control equipment problems: 0 hours
- Process problems: 0 hours
- Other known causes: 0 hours
- Other unknown causes: 0 hours

(e)(7) A summary of the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system during the reporting

period (recorded in minutes for opacity and hours for gases and in the averaging time specified in the regulation for other types of standards), and the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system as a percent of the total source operating time during that reporting period: See attached Table 1.

(e)(8) A breakdown of the total duration of downtime for the continuous opacity monitoring system or continuous emission monitoring system during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes: See attached Table 1.

(e)(9) An identification of each HAP that was monitored at the affected source: CO is monitored as a surrogate for organic HAPs.

(e)(10) A brief description of the process units:

The Fluidized Catalytic Cracking Unit (FCCU) is a refinery process unit used for the production of gasoline. Heavy oil, which is used as the feedstock, is catalytically cracked in a fluidized catalyst bed to produce C3 olefins, C4 olefins and isobutanes. In the cracking reactor, heavy carbonaceous materials (coke) become deposited on the catalyst, requiring continuous regeneration. The catalyst is circulated to a fluidized bed regenerator where these deposits are combusted. Most of the catalyst particles entrained in the regenerator flue gas are then removed in two stages of cyclones within the regenerator vessel and then are returned to the fluidized bed reactor.

At the Trainer Refinery, the FCCU control devices include a CO Boiler for CO reduction, an Enhanced Selective Non-Catalytic Reduction (eSNCR) unit for NO_x reduction, an electrostatic precipitator for PM reduction and a wet gas scrubber for PM and SO₂ reduction.

(e)(11) The monitoring equipment manufacturer(s) and model number(s): SO₂ Analyzer – Ametek Process Instruments, Model 921 Single Gas Analyzer; NO_x Analyzer – Ametek Process Instruments, Model 922 Single Gas Analyzer; CO and O₂ Analyzer – Servomex Company Inc., Model 4900 Analyzer.

(e)(12) The date of the latest certification or audit for the continuous gas analysis system or continuous emission monitoring system: Annual RATA conducted on the SO₂ and O₂ monitors July 17, 2014.

(e)(13) A description of any change in the continuous emission monitoring system or continuous opacity monitoring system, processes, or controls since the last reporting period: Not Applicable.

2. Platformer Unit

[§63.1566-1567]

The refinery operates one Catalytic Reforming Unit. As required by Subpart UUU, the refinery collects catalyst samples at the inlet and outlet of the Chlorsorb unit in accordance with their operations, maintenance and monitoring plan. The facility's operating permit requires that the weekly average chloride concentration of the samples at the inlet be less than 1.35% by weight and at the outlet be less than 1.80%. During this reporting period, one deviation was noted. A sample of the inlet catalyst was not analyzed on July 6, 2014.

Also, as part of the Subpart UUU requirements, the refinery is required to monitor the vent gas temperature at the inlet to the Chlorsorb unit and demonstrate that the daily average temperature has not exceeded the maximum temperature demonstrated during the 2006 performance test. For the period July 1, 2014 to December 31, 2014, the Platformer vent gas to the Chlorsorb unit was monitored continuously and the daily average temperature during the reporting period did not exceed the maximum allowable inlet temperature of 350 deg. F when the Platformer Regenerator was operating.

3. SRU

[§63.1568]

The refinery operates two Sulfur Recovery Units. The required SO₂ and O₂ Continuous Emissions Monitoring System (CEMS) were installed in April 2005 and have been in operation since installation.

As required under §63.1575(d) and (e), information must be provided for any deviation of the emission limitation for the SRU: During this reporting period there were no deviations reported; therefore, no additional information is provided.

4. Bypass Lines

[§63.1569]

The FCCU does not have any bypass lines. The Platformer Chlorsorb Unit was not bypassed during this reporting period. The Sulfur Recovery Unit was not bypassed during this reporting period.

5. Start-up, Shutdown, and Malfunction Plans (SSMP)

[§63.10(d)(5)]

Any startup, shutdown, and malfunction at the Facility which occurred during the reporting period were managed consistent with the facility's SSMP. A record of the malfunction events and copies of the event notification letters, if any, to PADEP are provided in Attachment A. There were no events or notification letters for this reporting period.

Table 1: Downtime Events

TABLE 1
Downtime Events - Duration
Plant: MONROE ENERGY, LLC.
Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
Time Online Criteria: 1 minute(s)

Source: SRUSTACK
Parameter: SO2PPMC
Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/18/2014 08:00	07/18/2014 08:59	1.00	08 - NORMAL OPERATION 20 - CORRECTIVE MAINTENANCE
Comments: Corrective Maintenance in response to "Maintenance Limit" calibration warning. Successful recalibration completed after corrective maintenance (if any) was completed.				
2	07/18/2014 11:00	07/18/2014 12:59	2.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
3	08/04/2014 09:00	08/04/2014 11:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
4	08/13/2014 02:00	08/13/2014 02:59	1.00	08 - NORMAL OPERATION 16 - PRIMARY ANALYZER MALFUNCTION
5	08/15/2014 08:00	08/15/2014 08:59	1.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
6	08/16/2014 06:00	08/16/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
7	08/29/2014 07:00	08/29/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
8	08/30/2014 06:00	08/30/2014 11:59	6.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	09/08/2014 06:00	09/08/2014 07:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
10	09/18/2014 14:00	09/18/2014 15:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
11	09/19/2014 06:00	09/19/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	09/20/2014 08:00	09/20/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on SO2 and O2 analyzers.				
13	09/24/2014 07:00	09/24/2014 08:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
14	10/06/2014 06:00	10/06/2014 07:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
15	10/11/2014 07:00	10/11/2014 08:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
16	10/28/2014 06:00	10/28/2014 08:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
17	10/29/2014 06:00	10/29/2014 08:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
18	11/02/2014 06:00	11/02/2014 08:59	3.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
19	12/08/2014 09:00	12/08/2014 09:59	1.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
20	12/08/2014 11:00	12/08/2014 11:59	1.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
21	12/09/2014 06:00	12/09/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
22	12/11/2014 09:00	12/11/2014 10:59	2.00	08 - NORMAL OPERATION 20 - CORRECTIVE MAINTENANCE
23	12/17/2014 09:00	12/17/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION

TABLE 1 Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: SRUSTACK

Parameter: SO2PPMC

Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
Comments: 4Q2014 Linearity Test on SO2 and O2 analyzers.				
24	12/20/2014 07:00	12/20/2014 12:59	6.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER

Number of Events: 24

Total Duration: 54.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	47
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	7
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	54
3. [Total CMS Downtime] x (100) / [Total source operating time]	1.2%

TABLE 1
Downtime Events - Duration
Plant: MONROE ENERGY, LLC.
Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: COPPMC
Interval: 001H

Operating Hours:

4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/02/2014 07:00	07/02/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
2	07/04/2014 06:00	07/04/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
3	07/05/2014 06:00	07/05/2014 08:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
4	07/06/2014 06:00	07/06/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
5	07/07/2014 06:00	07/07/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
6	07/08/2014 06:00	07/08/2014 08:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
7	07/09/2014 10:00	07/09/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
8	07/10/2014 06:00	07/10/2014 06:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
9	07/11/2014 07:00	07/11/2014 08:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
10	07/16/2014 10:00	07/16/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
11	07/17/2014 07:00	07/17/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
12	07/22/2014 13:00	07/22/2014 13:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
13	07/24/2014 10:00	07/24/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
14	08/04/2014 08:00	08/04/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
15	08/06/2014 07:00	08/06/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
16	08/09/2014 08:00	08/09/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
17	08/13/2014 07:00	08/13/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
18	08/14/2014 14:00	08/14/2014 14:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
19	08/16/2014 07:00	08/16/2014 09:59	3.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
20	08/18/2014 09:00	08/18/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
21	08/20/2014 08:00	08/20/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
22	08/21/2014 14:00	08/21/2014 14:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
23	08/24/2014 08:00	08/24/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
24	08/25/2014 07:00	08/25/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION

TABLE 1

Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK

Parameter: COPPMC

Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
25	08/26/2014 07:00	08/26/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
26	08/27/2014 10:00	08/27/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
27	08/29/2014 08:00	08/29/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
28	09/01/2014 09:00	09/01/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
29	09/08/2014 07:00	09/08/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
30	09/11/2014 09:00	09/11/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
31	09/13/2014 06:00	09/13/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
32	09/14/2014 06:00	09/14/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
33	09/18/2014 09:00	09/18/2014 12:59	4.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				
34	09/19/2014 09:00	09/19/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
35	09/20/2014 12:00	09/20/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
36	09/22/2014 07:00	09/22/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
37	09/25/2014 07:00	09/25/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
38	09/26/2014 07:00	09/26/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
39	09/26/2014 12:00	09/26/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
40	10/04/2014 06:00	10/04/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
41	10/08/2014 12:00	10/08/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
42	10/16/2014 07:00	10/16/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
43	10/20/2014 08:00	10/20/2014 09:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
44	10/22/2014 08:00	10/22/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
45	10/30/2014 07:00	10/30/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
46	11/06/2014 09:00	11/06/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
47	11/12/2014 10:00	11/12/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
48	11/14/2014 08:00	11/14/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION

TABLE 1 Downtime Events - Duration

Plant: MONROE ENERGY, LLC.
Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: COPPMC
Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
49	11/18/2014 08:00	11/18/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
50	11/21/2014 10:00	11/21/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
51	11/26/2014 13:00	11/26/2014 13:59	1.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
52	11/26/2014 15:00	11/26/2014 15:59	1.00	08 - NORMAL OPERATION 15 - PREVENTIVE MAINTENANCE
53	12/07/2014 08:00	12/07/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
54	12/10/2014 09:00	12/10/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
55	12/15/2014 09:00	12/15/2014 11:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				
56	12/16/2014 09:00	12/16/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION

Comments: 4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.

Number of Events: 56
Total Duration: 79.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	9
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	70
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	79
3. [Total CMS Downtime] x (100) / [Total source operating time]	1.8%

TABLE 1

Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK

Parameter: NOXPPMC

Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/02/2014 07:00	07/02/2014 08:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
2	07/04/2014 06:00	07/04/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
3	07/05/2014 06:00	07/05/2014 08:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
4	07/06/2014 06:00	07/06/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
5	07/07/2014 06:00	07/07/2014 07:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
6	07/08/2014 06:00	07/08/2014 08:59	3.00	08 - NORMAL OPERATION 14 - RECALIBRATION
7	07/11/2014 07:00	07/11/2014 07:59	1.00	08 - NORMAL OPERATION
8	08/13/2014 06:00	08/13/2014 08:59	3.00	12 - EXCESS DRIFT ANCILLARY ANALYZER 08 - NORMAL OPERATION
9	08/16/2014 08:00	08/16/2014 09:59	2.00	11 - EXCESS DRIFT PRIMARY ANALYZER 08 - NORMAL OPERATION
10	08/21/2014 14:00	08/21/2014 14:59	1.00	15 - PREVENTIVE MAINTENANCE 08 - NORMAL OPERATION
11	09/13/2014 06:00	09/13/2014 07:59	2.00	14 - RECALIBRATION 08 - NORMAL OPERATION
12	09/14/2014 06:00	09/14/2014 08:59	3.00	11 - EXCESS DRIFT PRIMARY ANALYZER 08 - NORMAL OPERATION
13	09/18/2014 09:00	09/18/2014 09:59	1.00	11 - EXCESS DRIFT PRIMARY ANALYZER 08 - NORMAL OPERATION
Comments:	3Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.			14 - RECALIBRATION
14	09/18/2014 12:00	09/18/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments:	3Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.			
15	10/04/2014 06:00	10/04/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
16	10/16/2014 06:00	10/16/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
17	10/20/2014 08:00	10/20/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
18	11/26/2014 13:00	11/26/2014 13:59	1.00	08 - NORMAL OPERATION
19	11/26/2014 15:00	11/26/2014 15:59	1.00	20 - CORRECTIVE MAINTENANCE 08 - NORMAL OPERATION
20	12/15/2014 09:00	12/15/2014 10:59	2.00	14 - RECALIBRATION 08 - NORMAL OPERATION
Comments:	4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.			14 - RECALIBRATION
21	12/16/2014 09:00	12/16/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments:	4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.			

Number of Events: 38

Total Duration: 61.00 hours

TABLE 1

Downtime Events - Duration

Plant: MONROE ENERGY, LLC.
 Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
 Time Online Criteria: 1 minute(s)

Source: FCCSTACK
 Parameter: NOXPPMC
 Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
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CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	14
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	24
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	38
3. [Total CMS Downtime] x (100) / [Total source operating time]	0.9%

TABLE 1 Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FCCSTACK

Parameter: SO2PPMC

Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/02/2014 06:00	07/02/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
2	07/05/2014 07:00	07/05/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
3	07/06/2014 06:00	07/06/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
4	07/08/2014 06:00	07/08/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	07/09/2014 10:00	07/09/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
6	07/11/2014 07:00	07/11/2014 08:59	2.00	08 - NORMAL OPERATION 12 - EXCESS DRIFT ANCILLARY ANALYZER
7	07/16/2014 10:00	07/16/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
8	07/17/2014 06:00	07/17/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	07/22/2014 13:00	07/22/2014 13:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
10	07/24/2014 10:00	07/24/2014 10:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
11	08/06/2014 06:00	08/06/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	08/16/2014 06:00	08/16/2014 09:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
13	08/24/2014 06:00	08/24/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
14	09/08/2014 06:00	09/08/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
15	09/11/2014 06:00	09/11/2014 09:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
16	09/13/2014 06:00	09/13/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
17	09/14/2014 06:00	09/14/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
18	09/18/2014 09:00	09/18/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				
19	09/18/2014 12:00	09/18/2014 12:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				
20	09/22/2014 07:00	09/22/2014 07:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
21	10/04/2014 06:00	10/04/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
22	10/16/2014 06:00	10/16/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
23	10/20/2014 06:00	10/20/2014 09:59	4.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER

TABLE 1
Downtime Events - Duration
Plant: MONROE ENERGY, LLC.
Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
Time Online Criteria: 1 minute(s)

Source: FCCSTACK
Parameter: SO2PPMC
Interval: 001H

Operating Hours: 4,288.38

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
24	10/30/2014 06:00	10/30/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
25	11/12/2014 06:00	11/12/2014 10:59	5.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
26	11/18/2014 06:00	11/18/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
27	11/21/2014 06:00	11/21/2014 10:59	5.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
28	11/26/2014 15:00	11/26/2014 15:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
29	12/01/2014 06:00	12/01/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
30	12/07/2014 06:00	12/07/2014 08:59	3.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
31	12/15/2014 09:00	12/15/2014 10:59	2.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				
32	12/16/2014 09:00	12/16/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 4Q2014 Linearity Test on CO, NOx, SO2, and O2 analyzers.				

Number of Events: 32
Total Duration: 73.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	62
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	11
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	73
3. [Total CMS Downtime] x (100) / [Total source operating time]	1.7%

TABLE 1 Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: N_H2S

Parameter: N_H2S

Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/22/2014 06:00	07/22/2014 07:59	2.00	08 - NORMAL OPERATION
2	08/05/2014 06:00	08/05/2014 07:59	2.00	11 - EXCESS DRIFT PRIMARY ANALYZER
3	08/09/2014 06:00	08/09/2014 08:59	3.00	08 - NORMAL OPERATION
4	09/08/2014 12:00	09/08/2014 12:59	1.00	11 - EXCESS DRIFT PRIMARY ANALYZER
				08 - NORMAL OPERATION
				14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on H2S analyzer.				
5	12/05/2014 13:00	12/05/2014 13:59	1.00	08 - NORMAL OPERATION
				14 - RECALIBRATION
Comments: 4Q2014 Linearity Test on H2S analyzer.				

Number of Events: 5

Total Duration: 9.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	7
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	9
3. [Total CMS Downtime] x (100) / [Total source operating time]	0.20%

TABLE 1

Downtime Events - Duration

Plant: MONROE ENERGY, LLC.
Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
Time Online Criteria: 1 minute(s)

Source: S_H2S
Parameter: S_H2S
Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/01/2014 07:00	07/01/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
2	07/04/2014 07:00	07/04/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
3	07/08/2014 06:00	07/08/2014 07:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
4	07/09/2014 07:00	07/09/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
5	07/10/2014 06:00	07/10/2014 10:59	5.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
6	07/15/2014 07:00	07/15/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
7	07/25/2014 07:00	07/25/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
8	08/05/2014 07:00	08/05/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
9	08/06/2014 07:00	08/06/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
10	08/11/2014 07:00	08/11/2014 07:59	1.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
11	08/23/2014 07:00	08/23/2014 13:59	7.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
12	08/27/2014 07:00	08/27/2014 08:59	2.00	08 - NORMAL OPERATION 11 - EXCESS DRIFT PRIMARY ANALYZER
13	09/08/2014 08:00	09/08/2014 08:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 3Q2014 Linearity Test on H2S analyzer.				
14	12/10/2014 09:00	12/10/2014 09:59	1.00	08 - NORMAL OPERATION 14 - RECALIBRATION
Comments: 4Q2014 Linearity Test on H2S analyzer.				

Number of Events: 14
Total Duration: 28.00 hours

CMS Performance Summary

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	26
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	2
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	28
3. [Total CMS Downtime] x (100) / [Total source operating time]	0.63%

TABLE 1

Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: FLARE

Parameter: H2SCONC

Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/14/2014 11:00	07/14/2014 14:59	4.00	08 - NORMAL OPERATION
2	09/04/2014 06:00	09/04/2014 07:59	2.00	11 - EXCESS DRIFT PRIMARY ANALYZER
3	09/19/2014 11:00	09/19/2014 11:59	1.00	08 - NORMAL OPERATION
Comments: 3Q2014 Linearity Test on H2S analyzer.				14 - RECALIBRATION
4	11/04/2014 16:00	11/05/2014 03:59	12.00	08 - NORMAL OPERATION
5	11/05/2014 06:00	11/05/2014 10:59	5.00	14 - RECALIBRATION
6	12/11/2014 16:00	12/11/2014 17:59	2.00	08 - NORMAL OPERATION
Comments: 4Q2014 Linearity Test on H2S analyzer.				11 - EXCESS DRIFT PRIMARY ANALYZER
				14 - RECALIBRATION

Number of Events: 6

Total Duration: 26.00 hours

TABLE 1
Downtime Events - Duration
 Plant: MONROE ENERGY, LLC.
 Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59
 Time Online Criteria: 1 minute(s)

Source: FLARE
 Parameter: H2SCONC
 Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
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CMS Performance Summary ^(a)

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	11
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	15
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	26
3. [Total CMS Downtime] x (100) / [Total source operating time]	0.6%

^(a) Downtime occurring prior to CEMS certification not included in Performance Summary.

TABLE 1 Downtime Events - Duration

Plant: MONROE ENERGY, LLC.

Report Period: 07/01/2014 00:00 Through 12/31/2014 23:59

Time Online Criteria: 1 minute(s)

Source: SRUFLARE

Parameter: H2SCONC

Interval: 001H

Operating Hours: 4,416.00

Incident ID	Start Date/Time	End Date/Time	Duration (hours)	Reason Code - Description Action Code - Description
1	07/07/2014 19:00	07/08/2014 03:59	9.00	08 - NORMAL OPERATION
2	07/08/2014 05:00	07/08/2014 18:59	14.00	16 - PRIMARY ANALYZER MALFUNCTION
3	08/27/2014 18:00	08/29/2014 04:59	35.00	08 - NORMAL OPERATION
4	08/29/2014 06:00	08/30/2014 06:59	25.00	11 - EXCESS DRIFT PRIMARY ANALYZER
5	09/09/2014 06:00	09/09/2014 11:59	6.00	08 - NORMAL OPERATION
6	09/29/2014 06:00	09/29/2014 08:59	3.00	16 - PRIMARY ANALYZER MALFUNCTION
7	12/08/2014 09:00	12/08/2014 09:59	1.00	08 - NORMAL OPERATION
8	12/08/2014 11:00	12/08/2014 11:59	1.00	11 - EXCESS DRIFT PRIMARY ANALYZER
9	12/30/2014 07:00	12/30/2014 18:59	12.00	08 - NORMAL OPERATION
				16 - PRIMARY ANALYZER MALFUNCTION
				11 - EXCESS DRIFT PRIMARY ANALYZER

Number of Events: 9

Total Duration: 106.00 hours

CMS Performance Summary ^(a)

1. CMS downtime in the reporting period due to:	
a. Monitor equipment malfunctions	106
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	0
d. Other known causes	0
e. Unknown causes	0
2. Total CMS Downtime	106
3. [Total CMS Downtime] x (100) / [Total source operating time]	2.4%

^(a) Downtime occurring prior to CEMS certification not included in Performance Summary.

Attachment A

- Environmental Incident Reports - None
- Excess Emission Report Form for Sources with Continuous Emission Monitoring

Attachment 5 **Excess Emissions Summary for 3rd Quarter 2013**

Monroe Energy, LLC – Trainer Refinery
Semianual Reporting Period Excess Emission Summary
Reporting Period: July 01, 2014 - December 31, 2014

Source	Operating Time (hrs)	Pollutant	Emission Standard				Excess Emissions		Comments
			Limit	Units	Averaging Period	Average Type	Duration (hrs)	Percentage of Operating Time (%)	
Claus Sulfur Recovery Plant (SRU) [Source ID 102]	4,416.00	SO ₂	250	ppmvd @ 0% O ₂	12-hour	Rolling	0.00	0.00%	
North Side Fuel Gas System (RFG) [Source FM002]	4,416.00	H ₂ S	162	ppmvd @ 0% O ₂	3-hour	Rolling	4.00	0.09%	
Southside Fuel Gas System: Amine Fuel Gas System [SourceID FM006] Naphtha Fuel Gas System [Source ID FM003] ISO LPS Fuel Gas System [Source ID FM004]	4,416.00	H ₂ S	162	ppmvd @ 0% O ₂	3-hour	Rolling	0.00	0.00%	
FCCU Unit [Source ID 101]	4,288.38	NO _x	500	ppmvd @ 0% O ₂	3-hour	Rolling	0.00	0.00%	This limit applies at all times when the FCCU and/or CO boiler are operating, except during periods of startup, shutdown, or malfunction. This limit applies at all times when the FCCU and/or CO boiler are operating.
			155.3	ppmvd @ 0% O ₂	7-day	Rolling	0.00	0.00%	
			121.1	ppmvd @ 0% O ₂	365-day	Rolling	0.00	0.00%	
			654.5	tons/year	12-month	Rolling Sum	0.00	0.00%	
		CO	500	ppmvd @ 0% O ₂	1-hour	Block	0.00	0.00%	
			434.1	tons/year	12-month	Rolling Sum	0.00	0.00%	
		SO ₂	50	ppmvd @ 0% O ₂	7-day	Rolling	0.00	0.00%	
			25	ppmvd @ 0% O ₂	365-day	Rolling	0.00	0.00%	
			165.8	tons/year	12-month	Rolling Sum	0.00	0.00%	
		Opacity	0.08	L/G Ratio Unitless	1-hour	Block	0.00	0.00%	The refinery monitors opacity in accordance with an approved Alternate Monitoring Plan which requires the refinery to monitor the liquid-to-gas ratio (L/G) of the FCC wet gas scrubber.
Source Gas Flare [Source ID 121]	4,416.00	H ₂ S	162	ppmvd @ 0% O ₂	3-hour	Rolling	0.00	0.00%	
Main Flare [Source ID 103]	4,416.00	SO ₂	500	lb/day	24-hr	Rolling	0.00	0.00%	

